

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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FOMETAL S.R.L.,
an Italian Limited Company,

Plaintiff,

**AFFIRMATION IN SUPPORT
OF REQUEST FOR
CERTIFICATE OF DEFAULT**

-against-

1:22-cv-01928 (KPF)

KEILI TRADING LLC, a Washington
Limited Liability Company, MENDEL
LEVITIN a/k/a MENDY LEVITIN, an
individual, RELIANCE STEEL &
ALUMINUM CO., a Delaware
corporation, ADMIRAL
SERVICENTER COMPANY,
INCORPORATED, a Massachusetts
Corporation, and O'NEAL FLAT
ROLLED MEATS a/k/a METAL
WEST LLC, a Colorado Limited
Liability Company

Defendants.

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Joshua D. Brinen, an attorney admitted to the bar of this Court, hereby swears as
follows:

1. I am the Principal in the law firm of Brinen & Associates, LLC, attorney for plaintiff FOMETAL S.R.L. (the "Plaintiff").
2. I make this affidavit from facts within my own knowledge and which I know to be true.
3. Plaintiff commenced the above-captioned action ("Action") against defendants Keili Trading LLC ("Keili Trading"); Mendel Levitin a/k/a Mendy Levitin ("Mendy Levitin");

Reliance Steel & Aluminum CO. (“Reliance”); Admiral Servicer Company, Incorporated (“Admiral”); and O’Neal Flat Rolled Meats a/k/a Metal West LLC (“Metal West”) (collectively “Defendants”) on March 8, 2022, by the filing of the Proposed Summons and Complaint. ECF No. 4.

4. On March 10, 2022, the Clerk of Court for the United States District Court for the Southern District of New York issued a Summons to the defendant Keili Trading and the defendant Mendy Levitin in the action. ECF No. 10, 11.

5. On March 24, 2022, the Plaintiff served defendant Keili Trading, by service of the Summons and Complaint upon Keili Trading’s registered agent, Northwest Registered Agent, LLC.

6. An Affidavit of Service was filed with the Court on April 20, 2022. ECF No. 29. A true and correct copy of the Affidavit of Service is annexed hereto as Exhibit “1”.

7. On March 31, 2022, Plaintiff served defendant Mendy Levitin, by service of the Summons and Complaint upon Anna Levitin, co-resident of Mendy Levitin.

8. An Affidavit of Service was filed with the Court on April 26, 2022. ECF No. 30. A true and correct copy of the Affidavit of Service is annexed hereto as Exhibit “2”.

9. Defendant Keili Trading is a limited liability company, and, as such, is not an infant, incompetent, or in the military of the United States.

10. Defendant Mendy Levitin is an individual, not an infant, incompetent, or in the military of the United States.

11. The time for defendant Keili Trading to answer or otherwise defend the lawsuit expired on April 14, 2022. See Exhibit “1”.

12. The time for defendant Mendy Levitin to answer or otherwise defend the lawsuit

expired on April 21, 2022. See Exhibit "2".

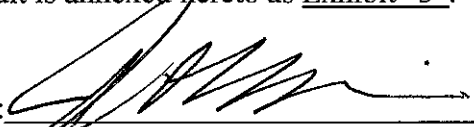
13. Defendant Keili Trading has not answered or otherwise defended itself in this lawsuit.

14. Defendant Mendy Levitin has not answered or otherwise defended himself in this lawsuit.

15. Wherefore, Plaintiff respectfully request that the default of defendants Keili Trading and Mendy Levitin be noted, and a certificate of default issued.

16. A Request for Clerk's Certificate of Default is annexed hereto as Exhibit "3".

Dated: New York, New York
July 21, 2022

By: 
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